



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

THOMAS A. CONNELLY, IN HIS)	
CAPACITY AS EXECUTOR OF THE)	Case No. 4:19-cv-01410-SRC
ESTATE OF MICHAEL P. CONNELLY, SR.,)	
)	
Plaintiff,)	
)	
v.)	
)	
THE UNITED STATES OF AMERICA,)	
DEPARTMENT OF THE TREASURY,)	
INTERNAL REVENUE SERVICE,)	
)	
Defendant.)	
)	

**PLAINTIFF THOMAS A. CONNELLY'S RESPONSE TO DEFENDANT'S
FOURTH SET OF REQUESTS FOR ADMISSION TO PLAINTIFF THOMAS
CONNELLY, IN HIS CAPACITY AS EXECUTOR OF THE ESTATE OF
MICHAEL P. CONNELLY, SR.**

COMES NOW, Plaintiff, Thomas A. Connelly, in his capacity as executor of the estate of Michael P. Connelly, Sr. and for his responses to Defendant's Fourth Set of Requests for Admissions directed to it, states as follows:

REQUESTS FOR ADMISSION

166. Admit that the Company used the proceeds from life insurance policies payable upon Connelly's death to satisfy its Redemption Obligations.

Response: Admit

167. Admit that the Company used the proceeds from three life insurance policies payable upon Connelly's death to satisfy its Redemption Obligations.

Response: Admit

168. Admit that AXA Policy Number 109021548 was payable upon Connelly's death. *See* C001647-C001692.

Response: Admit

169. Admit that the Company used the proceeds from AXA Policy Number 109021548 to satisfy, in part, its Redemption Obligations.

Response: Admit

170. Admit that the Company received \$1,002,060.62 (\$1,000,000 of proceeds plus \$2,060.60 of unused premiums) from AXA Policy Number 109021548 after Connelly's death. *See* C001620.

Response: Admit, but the amount received was \$1,002,060.60

171. Admit that, as of October 1, 2013, Connelly was the owner of AXA Policy Number 109021548.

Response: Denied – See Document C002613 – C002616 which is produced contemporaneously.

172. Admit that, as of October 1, 2013, Connelly had the power to change the beneficiary of AXA Policy Number 109021548.

Response: Denied – See C002613 – C002616.

173. Admit that AXA Policy Number 109021767 was payable upon Connelly's death. *See* C001827-C001875.

Response: Admit.

174. Admit that the Company used the proceeds from AXA Policy Number 109021767 to satisfy, in part, its Redemption Obligations.

Response: Admit.

175. Admit that the Company received \$1,001,834.14 (\$1,000,000 of proceeds plus \$1,834.14 of unused premiums) from AXA Policy Number 109021767 after Connelly's death. *See* C001621.

Response: Admit.

176. Admit that, as of October 1, 2013, Connelly was the owner of AXA Policy Number 109021767.

Response: Denied – See C002613 – C002616

177. Admit that, as of October 1, 2013, Connelly had the power to change the beneficiary of AXA Policy Number 109021767.

Response: Denied.

178. Admit that AXA Policy Number 159211555 was payable upon Connelly's death. *See* C001699-C001776.

Response: Admit.

179. Admit that the Company used the proceeds from AXA Policy Number 159211555 to satisfy, in part, its Redemption Obligations.

Response: Admit.

180. Admit that the Company received \$1,500,000.00 from AXA Policy Number 159211555 after Connelly's death. *See* C001622.

Response: Admit.

181. Admit that the Company used the proceeds from AXA Policy Numbers 109021548, 109021767, and 159211555 to satisfy its Redemption Obligations.

Response: Admit.

DANNA MCKITRICK, P.C.

Date: August 28, 2020

BY: /s/ Robert L. Devereux
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on August 28, 2020, service of the foregoing was accomplished via e-mail to James F. Breshahan II, who consented to service by e-mail at James.F.Bresnahan@usdoj.gov.

/s/ Robert L. Devereux